



**Wireless Internet
Service Provider**

September 13, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, St. Louis Broadband, LLC, provides fixed wireless broadband service in St. Louis. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no, or few broadband choices. We built our network using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in the St. Louis area can now get broadband service. Our service is mostly comprised of business customers. These customers have few options, some with no options at all. If it had not been for our service these customers, that now rely on broadband for their business, would have had to move or shut their doors. This would have been a loss of jobs in the St. Louis area, which has been hard hit by the recession.

St. Louis Broadband, LLC is very interested in utilizing television white spaces so that we can expand, and improve our service. With these bands we can cover areas that have never been covered before. These frequencies will allow us to DOUBLE to TRIPPLE our current infrastructure without the need for additional towers. These frequencies are also known for their wonderful propagation characteristics allowing us to negotiate Non-Line of Site (NLOS) clients, as well as maneuver among buildings, trees and hills. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available.

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*St. Louis Broadband is a
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WISPA Board of Directors
2010 -2011*



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I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying or not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower,

When I started in this industry in 1993 I knew that the Internet would someday become a utility. It would have to because it can replace the 'land line' and the television with interaction and reduced rates. Today is the day that the FCC is working on regaining their power that they lost to the last regime. Today is also the day that the FCC can make the TV Whitespace a resource for America.

I implore the FCC to do what is right for America and not big business by allowing unlicensed frequencies in the TV Whitespace spectrum.

Respectfully,

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